

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**POINT BRIDGE CAPITAL, LLC and  
HAL LAMBERT,**

**Plaintiffs,**

**v.**

**CHARLES JOHNSON,**

**Defendant.**

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**Case No. 4:24-cv-00988-P**

**Hon. Mark Pittman  
U.S. District Judge**

**FRIEDMAN & FEIGER LLP, LAWRENCE J. FRIEDMAN, AND W. CARTER  
BOISVERT'S MOTION TO WITHDRAW AS COUNSEL  
FOR DEFENDANT CHARLES JOHNSON**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW Friedman & Feiger LLP, Lawrence J. Friedman, and W. Carter Boisvert ("Movants"), counsel of record for Defendant Charles Johnson ("Defendant") and, pursuant to Local Rule 83.12 of the Local Rules of the United States District Court for the Northern District of Texas, file this Motion to Withdraw as Defendant's Counsel, and respectfully show unto the Court as follows:

1. Friedman & Feiger, LLP, Lawrence J. Friedman, and W. Carter Boisvert are counsel of record for Defendant.

2. The circumstances allowing withdrawal are within those provided in the Texas Disciplinary Rules of Professional Conduct. There is good cause for this Court to grant the motion to withdraw. Rule 1.15 (b)(5)-1.15 (b)(7) of the Rules of Professional Conduct permits a lawyer to withdraw from representing a client if (5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services, including an obligation to pay the lawyer's fee as agreed, and has been given reasonable warning that the lawyer will withdraw unless the obligation

is fulfilled; (6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or (7) other good cause for withdrawal exists. Here, Defendant has failed to fulfill his obligations to the lawyers regarding the lawyers' services, including the obligation to pay the lawyers fee as agreed, and has rendered the representation unreasonably difficult. *See* TEX. DISCIPLINARY R. PROF CONDUCT 1.15(b)(5)-(6). Defendant has been given reasonable warning that Movants would withdraw unless the obligations were fulfilled.

3. Accordingly, Friedman & Feiger, LLP requests that the Court permit the firm, Lawrence J. Friedman, and W. Carter Boisvert to withdraw as counsel of record for Defendant.

4. Defendant Johnson has advised Defendant's counsel that he would sign a consent approving withdrawal and was emailed a copy of the Motion with a Notice of Consent to Withdrawal of Counsel to sign on April 22, 2025. At Defendant's request, the Notice of Consent to Withdrawal of Counsel was sent via DocuSign on April 23, 2025. As of the filing of this motion, and after due diligence to get Defendant's signed consent, Defendant has not returned a signed copy of the Notice of Consent to Withdrawal of Counsel.

5. Movants are unaware if Defendant has a succeeding attorney at this time. The name address, telephone number, and email address of Defendant is Charles Johnson, 1624 Fieldthorn Drive, Reston, Virginia 20194, (617) 429-4718, charles@traitwell.com.

6. Charles Johnson has been provided with a copy of the current Scheduling Order in this case and is aware of upcoming deadlines, a mediation scheduled for May 28, 2025, and that the case is set for jury trial on the Court's trial docket beginning December 15, 2025.

7. A copy of this Motion has been emailed to Mr. Johnson.

8. This Motion is not presented for the purposes of delay but so that justice may be served.

**PRAYER**

WHEREFORE, Movants pray that the Court will grant Friedman & Feiger LLP's Motion to Withdraw as Defendant's counsel, and permit Friedman & Feiger, Lawrence J. Friedman, and W. Carter Boisvert to withdraw as Defendant's counsel, and for such other and further relief to which Friedman & Feiger may show itself to be justly entitled.

Respectfully submitted,

/s/ W. Carter Boisvert

**Lawrence J. Friedman**

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**ATTORNEYS FOR  
CHARLES JOHNSON**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Motion to Withdraw has been served on all counsel of record via the Court's Electronic Filing/Notification System on this 24<sup>th</sup> day of April 2025.

/s/ W. Carter Boisvert

W. Carter Boisvert

**CERTIFICATE OF CONFERENCE**

The undersigned counsel hereby certifies that he conferred with counsel for Plaintiffs Point Bridge Capital, LLC and Hal Lambert, and Plaintiffs' counsel advised that Plaintiffs are not opposed to the Motion.

/s/ W. Carter Boisvert  
W. Carter Boisvert